

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

ALFRED CHESTNUT, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. LKG-20-2342
)	
DONALD KINCAID, <i>et al.</i> ,)	
)	
Defendants.)	
)	

CERTIFICATE OF DISCOVERY CONFERENCE

On December 29, 2021, Mayer Engelsberg, counsel for Individual Defendants and Charles N. Curlett, Jr., counsel for Michael McGee, held a discovery conference via telephone and attempted to resolve the parties' discovery dispute.

The parties were unable to resolve their dispute and the Individual Defendants therefore submit the following issues to the Court for resolution: 1) Mr. McGee's assertion of attorney work product as a basis to withhold records responsive to Individual Defendants' records subpoena.

Date: December 29, 2021

Respectfully submitted,

/s/ Mayer Engelsberg
Shneur Nathan, Bar No. 20707
Avi T. Kamionski, Bar No. 20703
Mayer Engelsberg Bar No. 21105
Michael J. Elliker Bar No. 20810
NATHAN & KAMIONSKI LLP
575 S. Charles Street Suite 402
Baltimore, MD 21201
(312) 612-1928
(312) 448-6099
akamionski@nklawllp.com
snathan@nklawllp.com
mengelsberg@nklawllp.com

melliker@nklawllp.com

*Attorneys for Donald Kincaid, Bryn Joyce, &
John Barrick*

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2021, I caused the foregoing document to be electronically filed with the Court's CM/ECF system, which will send an electronic copy of the same to all counsel of record, and that I served a copy of the same on counsel for Michael McGee, via email.

/s/ Mayer Engelsberg